



PROGRESS REPORT NO. 132

TO: Laura Buelow, U.S. Environmental Protection Agency (EPA) – via Email
Kathryn Cerise, EPA – via Email

FROM: Kris McCaig – Teck American Incorporated (TAI)

DATE: July 6, 2017

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) - Progress Report No. 132 Month Ending June 2017

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Sediments – TAI is in receipt of a letter from EPA dated May 23, 2017 in which EPA describes EPA's approach to the sediment bioassay analysis and a summary of EPA's current understanding of sediment and sediment toxicity conditions in the UCR. The letter was reviewed by TAI in preparation for the sediments technical meeting that was held on June 7, 2017. Follow-up actions coming out of the meeting are being conducted by TAI's technical team in preparation for a future meeting.

Benthic Macroinvertebrate Tissue Study – Laboratory processing and analysis of the mussel and crayfish composite was completed in June and data are currently being validated. At the time of writing, EPA was notified on July 6, 2017 that the first validation reports and data are available for EPA quality assurance review. All validated data with location information will be submitted to EPA by July 14, 2017. EPA delivered a revised version of the quality assurance project plan (QAPP) for the BMI Tissue Study split sample analysis on May 31, 2017 and TAI responded with minor comments on June 9, 2017. The QAPP was finalized by EPA and provided to TAI on June 13, 2017.

Recreation Consumption and Resource Use Survey – EPA provided the Draft Final Data Analysis Report (DAR) for the Recreational Use Survey to TAI on April 15, 2016 and TAI submitted review comments to EPA on June 10, 2016. TAI has postponed its review of the November 23, 2015 Memorandum written by SRC titled "Recreation Use Survey Fish Ingestion Rate" given that the memorandum referenced the following version of the DAR for the recreational use survey: "SRC, Inc. (2014). Data analysis report for the

recreational use survey for the Upper Columbia River Site human health risk assessment and remedial investigation/feasibility study. Prepared under contract for the Environmental Protection Agency. January 16.” The comments were discussed during the May 11-12, 2017 human health risk assessment (HHRA) meeting and again during the HHRA call between EPA and TAI on June 13, 2017.

Tribal Consumption and Resource Use Survey – On June 27, 2016 EPA submitted the April 30, 2016 report titled “Statistical Review of a Report on Food Consumption and Resource Use among Residents of the Colville Reservation” as prepared by The Mountain-Whisper-Light Statistics for TAI to review and provide comment. TAI provided review comments to EPA on September 26, 2016. EPA’s plan for revising the document was discussed during the May 11-12, 2017 HHRA meeting.

2016 Residential Soil Sampling – TAI received a letter from EPA dated June 5, 2017 with comments on the draft data summary report (DSR) for the 2016 Residential Soil Study. TAI will submit a revised DSR to EPA for review on or before July 14, 2017.

White Sturgeon Sediment Toxicity Study – In January 2014 TAI submitted to EPA, the draft final version of the Assessment of Sediment Toxicity to White Sturgeon Data Summary Report (DSR) and response to EPA’s comments. On August 10, 2015 TAI met with EPA to discuss the draft final DSR and TAI’s response to comments and clarify further changes needed in order to revise the DSR. TAI submitted a revised DSR and revised response to comments to EPA on November 20, 2015.

Soil Amendment Technologies Evaluation Study (SATES) – A spring technical and siting meeting was held on May 9, 2017 in Northport, WA and at the Trial Allotments. The Draft Phase I SATES work plan was submitted to EPA and the Participating Parties on May 25, 2017 for review and comment. TAI received comments from EPA in June and TAI will deliver a check version of the final SATES Work Plan to EPA on July 14, 2017. Permit applications were submitted to CCT on June 28, 2017.

White Sturgeon Fillet Tissue Study DSR – TAI received a letter from EPA dated May 30, 2017 with comments on the draft DSR. TAI submitted a draft final DSR in response to EPA comments on June 29, 2017. EPA delivered a revised version of the Field Summary Report on March 30, 2017 and TAI is responded with no further comments on May 12, 2017.

Assessment and Estimations of Upland Soils on the UCR Site (background soil study) – TAI is in receipt of a letter from EPA dated June 14, 2017 resolving the informal dispute; TAI disputed EPA’s July 22, 2016 Level of Effort (LOE) for Assessment and Estimations of Upland Soils (background study). TAI agreed to prepare a technical assessment in response to EPA’s LOE and to be complete the assessment independently of the delineation study. EPA agreed to consider new information resulting from the delineation study that may change the background soil numbers from the background assessment.

Delineation Study – As part of the above referenced June 14, 2017 informal dispute resolution, EPA and TAI agreed that a delineation study will be conducted within the RI/FS. The delineation study will consist of a combined analysis of empirical data (soil measurements), geospatial and geostatistical analyses, air modeling, and lead isotope ratio data.

Plant Tissue Study – TAI disputed EPA's December 8, 2016 directive to TAI to fund EPA to conduct terrestrial plant sampling. As part of the above referenced June 14, 2017 informal dispute resolution TAI agreed to conduct the plant tissue sampling prior to the completion of the delineation study, rather than fund EPA to conduct the sampling.. A technical meeting with EPA and CCT was held on June 22, 2017 to refine data quality objectives and determine efficiencies that may be gained by limiting the quality assurance project plan to what can be done this fall. The outcome of the meeting was to do field reconnaissance this fall and conduct sampling in the spring of 2018. Planning is underway for the reconnaissance to be done in mid-late August 2017.

Baseline ecological risk assessment (BERA) – a toxicity reference value (TRV) development webinar was held on June 26, 2017 between EPA and TAI for soil background and bioavailability TRV development.

HHRA – A meeting was held between EPA and TAI on May 11 and 12, 2017 to discuss several topics EPA is working on to support the HHRA. Action items were identified and a follow up conference call was held on June 13, 2017. The next HHRA call has been scheduled for August 1, 2017 to continue discussion around action items identified during the May meeting and June conference call.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.